

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA                    )  
  ) Criminal No. 11-186-S  
                  v.                                 )  
  )  
JOSEPH CARAMADRE                            )  
  )  
              and                                 )  
  )  
RAYMOUR RADHAKRISHNAN                    )  
  )  
              Defendants.                        )

GOVERNMENT'S OPPOSITION TO DEFENDANT  
CARAMADRE'S MOTION TO CONTINUE SENTENCING

The United States of America, by and through its undersigned attorneys, hereby opposes Defendant Joseph Caramadre's Motion to Continue the Sentencing Date.

The government will file its Response in Opposition to Caramadre's Motion to Withdraw His Guilty Plea as soon as possible, but no later March 8, 2013. An evidentiary hearing on Caramadre's Motion to Withdraw His Guilty Plea will be unnecessary because the facts alleged by Caramadre, even if taken true, would not entitle him to relief. United States v. Pulido, 566 F. 3d 52, 57(1<sup>st</sup> Cir.2009). Caramadre's Motion is the latest in a series of desperate attempts to delay the inevitable and avoid accountability for his criminal conduct. The sentencing should proceed as scheduled.

**CONCLUSION**

For the reasons set forth herein, Defendant Caramadre's Motion to Continue Sentencing should be denied.

Respectfully submitted,  
PETER F. NERONHA  
UNITED STATES ATTORNEY

/s/ John P. McAdams  
JOHN P. McADAMS  
Assistant U.S. Attorney

LEE H. VILKER  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of March, 2012, I caused the within Government's Opposition to Defendant Caramadre's Motion to Continue Sentencing to be served via the Court's Electronic Filing System on:

For Joseph Caramadre:  
Randy Olen, Esq.  
Robert Watt, Esq.

For Raymour Radhakrishnan:  
Olin Thompson, Esq.

/s/John P. McAdams  
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